

PRESENTED TO:
FEDERAL COMMUNICATIONS COMMISSION
445 12th Street SW
WASHINGTON DC 20554

RM-11753 Report # 3026
COMMENTS Re:
LPFM Licensees Propose Necessary Improvements to Low Power (LPFM) Radio Service

FROM:
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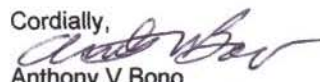
Gentleman,

Regarding the Proposal for LPFM changes: I am fully in support of many of the changes, not against any submitted. I am a commercial broadcaster and LPFMs have brought a breath of fresh air to the industry with creativity and new programming ideas. As a commercial broadcaster, I wish to support any of their efforts, their diverse original programming is bringing more consumer interest to the FM Band in general.

I particularly support the proposed 250 watt upgrade from 100 watts. As an engineer I can tell you that the 100 watts just isn't enough for adequate building penetration. These stations need a 3-4 db increase and the proposed increase to 250 watts would be a very good solution to the weak signal issue. I would also support any increase in maximum HAAT with that 250 watts to say maybe an increase to 100 meters from the present 30 meters HAAT. That would raise these signals above the terrain enough to reduce clutter and refractions thereby providing a better signal. I also fully support the prospect of playing commercials which would increase revenue. I would suggest that LPFMs in the NCE Band should be noncommercial and in the Nonreserve Band the LPFMs should be commercial, just as translators. LPFMs should be on equal status as Translators as far as spacing and separations are concerned.

Multiple ownership should be allowed and Commercial Broadcasters, like myself, should be allowed to own LPFMs if one or more were in a 501C3 organization, run separately from any Commercial Station. I have the time and the low cost with my experience would allow me to create some very eclectic programming. Something to consider. Never-the-less I support LPFMs as a Commercial Broadcaster and will help any LPFM licensee to succeed. The Commercial Broadcasters who are complaining and filing petitions against LPFM licensees, well, they should be ignored. They are just complaining since the large companies have terminated their creative staffs. NCEs and LPFMs have provided employment opportunities and a local voice for these talented creative people fired by large companies in the downsizing process. The large companies are just complaining and have no basis for their accusations against LPFMs. If a large Commercial Station at full power feels threatened by a small community LPFM, then the Commercial Station has nothing better to do and is jealous of the fresh creativity of the LPFM. There is no law against LPFM professionalism. Therefore, I support these efforts and the support the FCC has provided to engender these new local LPFM voices.

Cordially,


Anthony V Bono
Friendship Broadcasting LLC